

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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DISTRICT OF MASS.  
2005 FEB 18 P 12:57

ERIC KEELEY,

Plaintiff,

)

U.S. DISTRICT COURT  
DISTRICT OF MASS.

SHERIFF DIPACIPO, et al.

Defendants.

)  
C.A. No. 04-11192-RCL  
)

**PLAINTIFFS MOTION FOR SUMMARY  
JUDGEMENT FOR FAILURE OF THE  
DEFENDANTS TO PROPERLY OPPOSE  
THE COMPLAINT.**

Now Comes, The plaintiff in the above matter, and respectfully requests that that this Honorable Court grant, award, and ORDER Summary Judgement in the plaintiffs favor, for the following reasons;

The defendants response to the complaint is impenetrable, excessively vague and so ambiguous that it gives rise to continued deliberate indifference.

The repetitive statement " Calls on plaintiff to prove" does not serve ("Fair Notice") of defensive claims as outlined in Smith and Zobels Rules of Practice 6 MPS §12.19

The defendants offer no caselaw or opposition that states a valid legal dispute.

The section entitled "Defenses" are carbon copied analogies that have no force of law, argument, or explanations to survive a trial.

Attached is memorandum in support.

Respectfully,

Eric Keeley (Eric Keeley) Pro Se